

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KRANOS IP CORPORATION,)	
KRANOS IP II CORPORATION,)	
KRANOS CORPORATION DBA)	
SCHUTT SPORTS,)	Civil Action No.: 1:17-cv-06802
)	
Plaintiffs,)	Judge Matthew F. Kennelly
)	
v.)	
)	
RIDDELL, INC.,)	
)	
Defendant.)	

**PLAINTIFFS' CROSS-MOTION FOR SUMMARY JUDGMENT
OF INFRINGEMENT OF CLAIM 11 OF U.S. PATENT NO. 6,434,755
AND CROSS-MOTION FOR SUMMARY JUDGMENT
OF INFRINGEMENT OF CLAIM 14 OF U.S. PATENT NO. 8,499,366**

Plaintiffs Kranos IP Corporation, Kranos IP II Corporation, and Kranos Corporation d/b/a Schutt Sports (collectively "Schutt") respectfully move for an order granting: (i) its Cross-Motion for Summary Judgment of Infringement of Claim 11 of U.S. Patent No. 6,434,755 ("the '755 patent"); and (ii) its Cross-Motion for Summary Judgment of Infringement of Claim 14 of U.S. Patent No. 8,499,366 ("the '366 patent").

There is no genuine dispute that Riddell literally infringes claim 11 of the '755 patent. Riddell and its expert admit that the accused products meet each and every limitation of claim 11 of the '755 patent. Accordingly, summary judgment of infringement is warranted.

There is also no genuine dispute that Riddell literally infringes claim 14 of the '366 patent. Riddell and its expert argue only that Riddell's "Speed-Shell," 360, and SpeedFlex helmets do not include the limitation "wherein a front portion of the central channel is at the front edge," as recited by Claim 14 of the '366 patent. Riddell and its expert admit that those

accused products meet each and every other limitation of the '366 patent. Because there is no genuine issue that each of the shells of the products accused of infringing Claim 14 of the '386 patent includes a front portion of the central channel that extends all the way to the front edge of the helmet shell, summary judgment of infringement is warranted.

For the foregoing reasons and for the reasons stated in Schutt's supporting Consolidated Memorandum of Law and its Rule 56.1 Statement of Material Facts, Schutt respectfully requests that the Court grant its Cross-Motion for Summary Judgment of Infringement of Claim 11 of the '755 patent and its Cross-Motion for Summary Judgment of Infringement of Claim 14 of the '366 patent.

Dated: February 6, 2019

Respectfully submitted,

/s/ James J. Lukas, Jr.

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on February 6, 2019.

/s/ James J. Lukas, Jr.
